

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF DEEVA SHAH
IN SUPPORT OF DEFENDANT GOOGLE LLC'S SUR-REPLY TO
PLAINTIFF'S MOTION TO COMPEL DEPOSITION AND DOCUMENT DISCOVERY**

I, Deeva Shah, declare and state as follows:

I am an attorney licensed to practice law in the State of California and am admitted *pro hac vice* to practice before this Court. I am an attorney at the law firm of Keker, Van Nest & Peters LLP and counsel for Defendant Google LLC (“Google”) in the above-captioned action.

I submit this declaration in support of Google’s Sur-Reply to Plaintiff’s Motion to Compel Deposition and Document Discovery. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.

1. Attached hereto as Exhibit A is a true and correct copy of correspondence dated January 13, 2021 from counsel for Singular to counsel for Google.
2. Attached hereto as Exhibit B is a true and correct copy of correspondence dated April 6, 2021 from counsel for Singular to counsel for Google.
3. Attached hereto as Exhibit C is a true and correct copy of correspondence dated May 7, 2021 from counsel for Google to counsel for Singular.
4. Attached hereto as Exhibits D through S are communications from or to Dr. Bates that were produced by Google on August 21, 2023 and were not previously produced by Singular.
5. Attached hereto as Exhibit T is a letter dated August 28, 2023 from counsel for Google to counsel for Singular.
6. Attached hereto as Exhibit U is a true and correct copy of correspondence dated August 23, 2023 from counsel for Google to counsel for Singular.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 28, 2023, at San Francisco, California.

/s/ Deeva Shah

Deeva Shah

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed